

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 1:22-cr-10271-LTS
)	
)	
CATHERINE LEAVY)	

Leave to File Defendant's Sentencing Memorandum Under Seal

Ms. Catherine Leavy, the defendant in the above-captioned case, respectfully moves this Court to allow her counsel to file her sentencing memorandum, filed on June 17, 2024, under seal, and to file a redacted sentencing memorandum on the public docket. As grounds therefor, the defendant submits that the filed sentencing memorandum includes information quoted directly from Boston Children's Hospital's (BCH) impact statement, and the public availability of these quotes is currently generating increased on-line social media activity from social media sources responsible for the continued campaign of disinformation and harassment against BCH, potentially exposing BCH to continued targeting.

Respectfully submitted,
Ms. Catherine Leavy

By: /s/Forest O'Neill-Greenberg
Forest O'Neill-Greenberg
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Assistant Federal Public Defender
Federal Public Defender Office
51 Sleeper Street, 5th Floor
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CERTIFICATE OF SERVICE

I, Forest O'Neill-Greenberg, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 26, 2024.

/s/ Forest O'Neill-Greenberg
Forest O'Neill-Greenberg